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Attorneys for Plaintiff Abhinav Bhatnagar

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ABHINAV BHATNAGAR,
Plaintiff,

vs.

JASON INGRASSIA, individually and in
his official capacity; COUNTY OF
CONTRA COSTA; and CITY OF
SAN RAMON.

Defendants.

Case No.: Case No. CV07-02669 CRB

**NOTICE OF MOTION FOR A
PROTECTIVE ORDER PURSUANT
TO FED. R. CIV. PRO. 26(c)**

Date: December 7, 2007

Time: 10:00am

Honorable Charles R. Breyer

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on December 7, 2007, at 10:00 a.m., or as soon thereafter
as counsel may be heard, in the Courtroom of the Honorable Charles R. Breyer, Federal District
Judge of the Northern District of California, Courtroom 8, 19th Floor, 450 Golden Gate Avenue,

1 San Francisco, CA 94102, Plaintiff Abhinav Bhatnagar will move the Court for a protective order
2 pursuant to Fed. R. Civ. Pro., Rule 26(c) as follows: (1) to prohibit Defendant Ingrassia from
3 attending the deposition of Richard Ha, and (2) to order any further relief as this court may deem
4 just and proper.

5
6 This motion is based upon the accompanying memorandum of points of authorities, the
7 affidavits of Richard Ha, Plaintiff Abhinav Bhatnagar, Deputy Public Defender Diana Garrido,
8 Deputy Public Defender Timothy Ahearn, and Plaintiff's counsel, Jenny Huang.

9 Dated: November 21, 2007
10 Oakland, California

11 **JUSTICE FIRST, LLP**
12 Attorneys for Plaintiff Abhinav Bhatnagar
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